MERCEDES COLWIN MCOLWIN@GRSM.COM

RYAN SESTACK RSESTACK@GRSM.COM

JEFFREY CAMHI JCAMHI@GRSM.COM USDC SDNY DOCUMENT ELECTRONICALLY FILED

DOC #:

DATE FILED: 4/14/2020

ONE BATTERY PARK PLAZA 28TH FLOOR NEW YORK, NY 10004 PHONE: (212) 269-5500 FAX: (212) 269-5505 WWW.GRSM.COM

April 13, 2020

VIA ECF

Honorable Analisa Torres United States District Judge United States District Court Southern District of New York 500 Pearl Street New York, NY 10007

Re: Kairam v. West Side GI, LLC

Civil Action Number 1:18-cv-1005 (AT)\

Dear Judge Torres:

Gordon Rees Scully Mansukhani, LLP represents defendant West Side GI, LLC ("WSGI" or "Defendant") in this action. Pursuant to Your Honor's Individual Rules of Practice, Defendant writes to respectfully request an enlargement of time to file Defendant's motion to dismiss.

Currently, the deadline for Defendant to file its motion to dismiss is April 20, 2020. In light of a number of other deadlines as well as delays caused by Covid-19 pandemic, Defendant requests a three-week extension of time, until May 11, 2020, in which to file its motion.

I have conferred with Plaintiff's counsel and counsel has consented to the requested extension, which is Defendant's first request for an extension of time to file its motion to dismiss. In the event that Plaintiff subsequently requests a reasonable extension of her time to file opposition, Defendant would have no objection to such an extension.

We thank the Court for its consideration herein.

Respectfully submitted,

GORDON REES SCULLY MANSUKHANI, LLP

Jeffrey Camhi, Esq.

Jeffrey Camhi

cc. Mercedes Colwin, Esq. (via email & ECF) Ryan Sestack, Esq. (via email & ECF) Elizabeth Sheildkret, Esq. (via ECF)

GRANTED.

- 1. By **May 11, 2020**, Defendant shall file its motion to dismiss;
- 2. By June 1, 2020, Plaintiff shall file her response; and
- 3. By June 15, 2020, Defendant shall file its reply, if any.

SO ORDERED.

Dated: April 14, 2020

New York, New York

ANALISA TORRES United States District Judge